INTERNAL COMMUNICATION STRATEGY – DELIBERATIVE PROCESS
Draft: 5/1/08
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Reporting Activity Based Sampling Results
Libby Asbestos Superfund Site

Issue/Action

The analysis and interpretation of the results of the first round of the recent outdoor Activity Based Sampling (ABS) effort in Libby may cause concern among residents and stakeholders Libby as well as with EPA colleagues in Washington, D.C. Among other things, the ABS results call into question the quality of the backfill material EPA is using to replace contaminated soil and ultimately the efficacy over the long term of EPA cleanup efforts in Libby. Additionally, the ABS data highlight the need for EPA to determine the "background" level of Libby Amphibole that may be naturally occurring in the Libby Valley.

This communications strategy is designed to address the potential media, public, and internal reaction to communicating the ABS results to the citizens of Lincoln County, Montana as well as determining the most acceptable manner in which to frame EPA's ABS messages for all stakeholders. This strategy will also formulate answers to probable questions and identify EPA's spokesperson(s) on this issue.

Site Background

Libby is set in a picturesque valley carved by the Kootenai River and framed by the Cabinet Mountains at the northwest corner of Montana, just 35 miles east of Idaho and 65 miles south of Canada. The town has a population of less than 2,900; 12,000 people live within a ten-mile radius.

In November 1999, EPA sent an Emergency Response Team to Libby as the result of local concern and news articles about asbestos-contaminated vermiculite that was mined near town by the W.R. Grace Corporation. EPA's first priority was to assess the risk to public health with respect to asbestos contamination and eliminate the major sources of asbestos in the community. The mine has been inactive since 1990 and the public has not been allowed on the Grace property for several years.

In 2002, the Libby Asbestos Site was added to the NPL and 3,000+ properties were inspected and sampled. By October of 2007, 950+ properties have had asbestos removed and significant toxicity studies had been initiated to complete the Baseline Risk Assessment. Investigations have begun in the neighboring town of Troy (OU 7), at the mine site (OU 3), and at various processing areas (OUs 1, 2, 5, & 6).

EPA continues to work with the community to take the necessary actions to protect human health and the environment.

Internal Region 8/Libby Communications Structure

Key Contacts:	Function:	Work Phone:
Media Spokesperson(s):		
Kathie Atencio, EPR-SR	Program Unit Chief	303-312-6803
Paul Peronard, EPR-SR	Libby Team Leader	303-312-6808
EPA Region 8:		
Libby Site Team:		
Mike Cirian, EPR-SR	On-Site Project Manager	406-293-6194
Bonnie Lavelle, EPR-SR	RPM – OU 3	303-312-6579
Kathy Hernandez, EPR-SR	RPM – OUs 1,2,5,&6	303-312-6101
Matt Cohn, ENF	Enforcement Attorney	303-312-6853
Kelcey Land, ENF	Technical Enforcement	303-312-6393
Wendy O'Brien, EPR-TAU	Toxicologist/DVM, PhD	303-312-6712
Aubrey Miller, EPR-TAU	Toxicologist/MD	303-312-7023
Mary Goldade, EPR-TAU	Environmental Scientist/Chemist	303-312-7024
Ted Linnert, OCPI	Community Involvement Coord.	303-312-6119
Marty McComb, EPR-PS		
Key R-8 Management:		
Carol Campbell, EPR	Deputy A.R.A.	303-312-6051
Bill Murray, EPR-SR	Superfund Director	303-312-6401
Helen Dawson, EPR-TAU	Acting TAU Unit Chief	303-312-6791
Sonya Pennock, OCPI	PAI Supervisor	303-312-6600
Elisabeth Evans, EPR-PS	Program Support Director	303-312-6217
John Wardell	Montana Office Director	406-457-5001
State:		
Catherine LeCours, MDEQ	RPM - OU 7	406-841-5040
Richard Opper	Director, MDEQ	406-444-6815

Stakeholders:

Elected Officials:

U.S. Congressional Delegation	
Kirby Campbell-Rierson (Baucus - Kalispell)	406-756-1150/406-756-1150
Paul Wilkins (Baucus – D.C.)	202-224-7551
Virginia Sloan (Tester - Kalispell)	406-257-3859
Maren Olsen (Rehberg - Missoula)	406-543-9550 / 406-543-0663
Governor Brian Schweitzer	406-449-6373
Montana State Legislators	
Ralph Heinert, HD#1	406-293-9843
Lincoln County Commissioners	
John Konzen - Troy	406-295-4420 / 406-293-8577
Rita Windom - Libby	406-293-7781 x208 / 406-293-8577
Marianne Roose - Eureka	406-296-3139 X 209 / 406-293-8577
Libby Mayor Tony Berget	406-293-1776
Libby City Council President Charlene Leckrone	406-293-3755
Troy Mayor Jim Hammons	406-295-4151

Community:

Libby Community Advisory Group	See CAG list
Libby Technical Assistance Group Chair	See TAG list
Kathi Hooper, LC Environmental Health	406-293-7781 x231
Northwest Montana Human Resources	406-293-2712
Libby Job Service	406-293-6282
CARD Clinic	406-293-9274
ARD Net	
Chamber of Commerce	406-293-4167

Media:

Western News	406-293-4124
Montanian	406-293-8202
Kootenai Valley Record	406-293-2424
Tobacco Valley News	
KLCB/KTNY Radio Station, Libby	406-293-6234
KJRZ Radio Station, Libby	406-293-7625

Local television affiliates [Kalispell, Missoula, Great Falls, Helena, Spokane]
The Daily Interlake (Kalispell)
The Missoulian
Missoula Independent
Great Falls Tribune
Helena Independent Record
Spokesman-Review (Spokane)
Seattle Post Intelligencer – Andrew Schneider
www.CounterPunch.org – Andrea Peacock
The Denver Post/Rocky Mountain News
Associated Press

Strategy

Goals:

1. To keep the public and media informed consistent with our press policy and legal boundaries.
2. To convey the ABS data accurately and comprehensibly and to explain the practical implications to the public while at the same time recognizing the potential concerns of all stakeholders.
3. To diligently listen and respond to questions and concerns raised by residents and other stakeholders.

Messages:

- These ABS data indicate that there is a significant reduction in exposure (> 100 fold) resulting from the removal of vermiculite source material, especially at properties meeting our current removal criteria.
- The ABS data indicate that there is no difference between exposure resulting from activities conducted on our backfill material and exposure from unremediated soils (no visible vermiculite, non-detect by PLM).
- The ABS data indicate that there is Libby Amphibole in background soils. These levels appear to be lower than we can measure in solid media (< .05% LA), but still might produce exposure to LA during intense activity.
- EPA continues to run these numbers through our screening level risk calculations (see draft table(s) on next page) to evaluate, using currently available risk models, the predicted range of risks associated with disturbance of outdoor soils.
- As EPA continues to analyze these data from the indoor/outdoor ABS and the outdoor ambient air monitoring program, it seems likely that the main source of airborne exposure will be due to disturbance of outdoor soils.
- These outdoor ABS results support our intention to do a background study of soil in the Libby Valley.
- Based on this data set, EPA recommends that Libby residents exercise caution when engaging in routine activities such as mowing the lawn (i.e., choose humid/moist conditions). Also, it should be re-emphasized that children should be prevented from playing in dusty conditions, building dams in creeks, handling anything that pours from a hole in a wall, etc. Residents should minimize tracking dirt or dust into their homes and should clean frequently using a vacuum with a HEPA filter.
- At this time, EPA can say with confidence that we are reducing exposure to LA wherever we complete our work.
- These data are preliminary and incomplete since they represent only one round of outdoor ABS (still need the second round for an accurate representation of the seasonal range of condition and associated exposures).
- Although EPA has gained a great deal of information from our recent investigations, EPA cannot yet quantify the long-term health risks associated with disturbance of outdoor soils in Libby based on this partial data set.

PRELIMINARY CANCER RISK ESTIMATES for OUTDOOR SOIL DISTURBANCE EXPOSURE

Soil Category	Conc. (Total LA f/cc)	Cancer Risk Model				
		IRIS	IRIS'	BC	Site-Specific	Other Sites
Clean Fill	0.058	1.5E-05	2.3E-05	3.3E-05	5.1E-05	1.0E-04
Bin A Vis-	0.049	1.3E-05	1.9E-05	2.8E-05	4.3E-05	8.5E-05
Bin A Vis+	1.7	4.5E-04	6.7E-04	9.6E-04	1.5E-03	3.0E-03
Bin B1	0.20	5.3E-05	7.9E-05	1.1E-04	1.7E-04	3.5E-04
Bin B2	6.1	1.6E-03	2.4E-03	3.4E-03	5.3E-03	1.1E-02

Exposure Assumptions:

RBF(PCME)	0.34	PCME fibers/ total LA fibers
RBF(BC)	0.023	BC protocol fibers/ total LA fibers
ET	2	hrs/day
EF	20	days/yr
Age at start	0	yrs
Age at end	30	yrs

Table prepared by Syracuse Research Corporation, 3/08

Legend:

IRIS	=	EPA's "Integrated Risk Information System"
IRIS'	=	An enhanced version of the above
BC	=	Berman & Crump model
Bin	=	Range of asbestos levels
Bin A	=	Non-detect by PLM
Vis-/Vis+	=	Non-Visible or Visible vermiculite
Bin B1	=	< 0.2%
Bin B2	=	0.2%to1%

COMMUNICATION ACTION PLAN

Activity	Person(s) Responsible	When/Due	Comments	Results
Identify Spokesperson	Paul	Done.		
Strategy Meetings	Team	Ongoing		
Draft Communications Strategy	Ted	Done.	Comments being received from Team.	
Finalize Comm Strat	Ted and Team	Ongoing	Comm Strats are always a draft!	
Communicate with concerned colleagues in D.C. on a regular basis	Paul & Libby Managers	Ongoing	Regularly scheduled communications	
Explain ABS results to interested homeowners	Paul	Completed.	Personal attention was very well received.	Very positive.
Deliver messages in Libby at all regularly scheduled meetings in Libby and Troy	Paul, Mike, Ted, and Team	May Meeting Week (5/5-9/08) & at Town Hall Meeting (5/22/08)	Paul leads ABS results discussions at TAG, CAG, Commissioners, O&M, city councils, Congressionals, etc.	

QUESTIONS & ANSWERS

- **I'm confused. Is the backfill material you've been bringing in from outside of town clean or not?**

  Backfill material from Libby is as clean as the background soil throughout the Libby Valley. The fill from Eureka appears to have a lower level of LA, but our data on this point is extremely limited.

- **What is meant by the term "background" level of Libby Asbestos?**

  EPA refers to "background" as the level of Libby Amphibole that may occur naturally in the Libby Valley soil and not as a result of mining or mining-related activities. It is standard for EPA to determine background levels of the contaminant (i.e., LA) when working on Remedial Superfund sites.

- **Do these data really indicate that there is a "background" level of Libby Amphibole in Lincoln County?**

  EPA is initiating specific studies aimed at determining this background level of LA. in and around the Libby Valley. EPA is also looking at the possibility of recontamination occurring from properties not yet cleaned up.

- **How large is the geographic area that contains this background level of Libby Amphibole?**

  EPA will be sampling multiple locations within the Libby Valley to create a footprint of the background level for LA.

- **How will you test for background levels of Libby Amphibole in soil?**

  Background soil levels for any contaminant are usually measured in the soil; however, given the challenges of measuring low-levels of Libby Amphibole in soil, EPA will explore an alternative method, which is being developed.

- **Why is the background level of Libby Amphibole important?**

  If EPA is able to quantify the background level of LA in the Libby Valley, it will greatly help us determine the level to which we must clean up, thus answering the ever-recurring question: "How clean is clean?"

- **You've always said that this ABS effort would verify the efficacy of your cleanups. What's the verdict?**

  So far, the interior levels are very good, which suggest our interior cleanups are effective. However, the exterior levels are higher than we expected but much lower than pre-cleanup conditions (this is part of the reason prompting us to investigate the possibility of a background level for LA.).

- **How will this data help you produce the Baseline Risk Assessment for OU4?**

  If we can accurately identify and characterize exposure pathways, we can produce a meaningful and relevant risk assessment. By simulating the activities of Lincoln County residents in actual residential, occupational, and recreational settings, our field crews are recording exposures to LA that are directly applicable to conditions that exist in the area.

- **As a result of the ABS program, what, if anything, will EPA do differently?**

  Based on the results so far, EPA is implementing the investigation to determine a background level for LA, we'll re-examine our ABS scenarios to see if they are appropriate to evaluate risk, and we will continue to remove all visible vermiculite at all our cleanup sites.

- **Will you have to return to properties where you've already completed your work?**

  EPA has always stipulated that it's possible we may have to return to some properties after the Baseline Risk Assessment is completed.

- **Which of the simulated ABS activities registered the highest concentrations of Libby Amphibole?**

  The concentration amounts followed a fairly logical pattern. The outdoor results were higher than the indoor readings. Child's play outdoors registered higher readings than mowing and raking, which were about the same. Indoors, animated activities such as sweeping produced higher results than passive activities like watching TV.

- **Let's say it's possible for you to clean up the interior of a home to a level below background. Over time, with soil and dust being tracked into the house, wouldn't some sort of equilibrium ultimately be reached with the exterior, background level?**

  Your logic is sound, but we're not sure that it will hold up in all situations. Presumably, even though soil and dust is tracked into house, the house is also continuously being cleaned (hopefully with a HEPA vacuum!) – it is very difficult to determine if or when an equilibrium between indoor and outdoor levels of LA would be reached in a home where EPA has already completed its work.

- **Does the ABS data indicate vermiculite should be removed from walls?**

  Actually, they do not. The data indicate that leaving vermiculite in walls (or in crawlspaces, attics or carpets) doesn't significantly elevate indoor exposures; however, we are concerned about firefighters and/or workmen who might encounter encapsulated vermiculite during the course of their work. This is why it is so important to have an effective Operations and Maintenance program in place to manage these potential exposures over the long-term.

- **Is this background level only for soil? Is there a background level in the air?**

  Background soil levels for any contaminant apply only to soil; however, concentrations of Libby Amphibole in disturbed soil will effect what may be inhaled in the immediate breathing zone, as our previous ambient air sampling efforts have confirmed. As for the background level in air, outdoor ambient air sampling results show that average concentrations of Libby air are not a significant contribution to exposure.

- **Let's say that you can establish a background level for Libby Amphibole, can you tell us what the health consequences are from breathing air affected by the background level in the soil?**

  Once EPA has determined what the background level is, we will perform activity-based sampling on those background soils to determine what exposures result from breathing Libby Amphibole in air resulting from disturbed background soils.

- **Are you saying there is an <u>acceptable</u> exposure to Libby Amphibole?**

  At all Superfund sites, EPA attempts to clean to levels that would create health risks no greater than 10^{-4} - $^{-6}$ (between 1 in 10,000 and 1 in 1,000,000), meaning if there is a statistical probability that the risk is greater than 10^{-4}, EPA is mandated to reduce the risk. If the risk is less than 10^{-6} no action is required. If the risk is between 10^{-4} and 10^{-6}, EPA will take other factors into account (e.g., feasibility, cost, etc.). The concern in Libby is EPA's ability to measure those risks – we are making headway on the exposure aspect of the formula, but we still need to fully define our toxicological model.

- **What is the acceptable risk range for your soil categories?**

  Based on our current exposure assumptions, our clean fill is within our acceptable risk range (between 10^{-6} and 10^{-4}); however, the other soil categories represented in our sampling data are outside of this acceptable range. [see table on p. 5]

- **If you can't tell us that it's safe to live with this background level, what's the point of doing further cleanups?**

  Residences where we have completed our work are definitely safer than those that meet our trigger cleanup criteria but have not yet been addressed. We are moving forward as quickly as possible to determine risks from potential background levels of Libby Amphibole. We know our cleanups are reducing the risk of breathing Libby Amphibole, so we feel it is prudent to proceed with the cleanups.